

# EXHIBIT A



**VRLC**  
VICTIMS' RECOVERY  
LAW CENTER

September 5, 2023

POLYMER80, INC.  
**ATTENTION: LEGAL/RISK MANAGEMENT**  
134 Lakes Boulevard  
Dayton, NV 89403

**RE: Hector Garcia and Roseann Morrison, Individually and as  
Co-Administrators of the Estate of Sahmya Garcia, Deceased v.  
Polymer80, Inc., Marcus Burney  
Philadelphia CCP Docket No. 230703100**

Dear Sir/Madam:

Please be advised that our office has been retained to represent Plaintiffs', Hector Garcia and Roseann Morrison, Individually and as Co-Administrators of the Estate of Sahmya Garcia, Deceased, for an incident that occurred on November 8, 2022, in Philadelphia, Pennsylvania. On August 29, 2023, the enclosed Writ of Summons was filed in the Philadelphia Court of Common Pleas naming Polymer80, Inc., as a Defendant.

To that end, enclosed you will find three Notices of Intent to Serve Subpoenas and Twenty (20) Day Waiver directed to The Philadelphia Police Department, The Philadelphia Office of the District Attorney, and Edward C. Meehan Jr. Esquire, the criminal defense attorney for Marcus Burney. After your review, kindly advise whether or not you will agree to waive the twenty (20) day waiting period to serve the subpoena.

*You should forward the enclosed paperwork to your lawyer at once so that we may deal with him/her directly. If you do not have a lawyer or cannot afford one, go to the Philadelphia Bar Association Lawyer Referral and Information Service, One Reading Center, Philadelphia, PA 19107; (215) 238-6333.*

Very Truly Yours,

/s/ David P. Thiruselvam

DAVID P. THIRUSELVAM

/ck

Encs.

**VIA PRIORITY MAIL -Signature Required**

9410803699300163032117

# Civil Cover Sheet

For Prothonotary Use Only (Docket Number)

**AUGUST 2023**

**02980**

E-Filing Number: 2308060407

PLAINTIFF'S NAME HECTOR GARCIA		DEFENDANT'S NAME POLYMER80, INC.	
PLAINTIFF'S ADDRESS 1719 KOSSUTH STREET CAMDEN NJ 08104		DEFENDANT'S ADDRESS 134 LAKES BOULEVARD DAYTON NV 89403	
PLAINTIFF'S NAME ROSEANN MORRISON		DEFENDANT'S NAME MARCUS BURNEY	
PLAINTIFF'S ADDRESS 206 W. BUCK STREET PAULSBORO NJ 08066		DEFENDANT'S ADDRESS 7901 STATE ROAD PHILADELPHIA PA 19136	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 2	COMMENCEMENT OF ACTION <input type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input checked="" type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:		
CASE TYPE AND CODE 20 - PERSONAL INJURY - OTHER			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		FILED PRO PROTHY AUG 29 2023 C. SMITH	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>HECTOR GARCIA , ROSEANN MORRISON</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY DAVID P. THIRUSELVAM		ADDRESS THE VICTIMS' RECOVERY LAW CENTER 121 S BROAD ST, 18TH FL PHILADELPHIA PA 19107	
PHONE NUMBER (215) 546-1433	FAX NUMBER (215) 644-8754		
SUPREME COURT IDENTIFICATION NO. 61815		E-MAIL ADDRESS david@victimrecoverylaw.com	
SIGNATURE OF FILING ATTORNEY OR PARTY DAVID THIRUSELVAM		DATE SUBMITTED Tuesday, August 29, 2023, 09:07 am	

**VICTIMS RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification Nos.: 61815/317426

121 South Broad Street

Eighteenth Floor

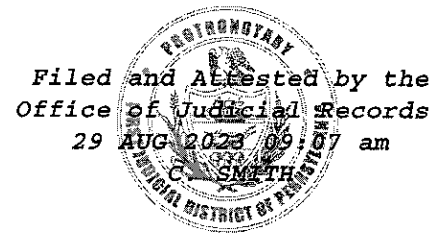
Philadelphia, PA 19107

(215) 546-1433 - Telephone

(215) 644-8754 - Facsimile

[david@victimrecoverylaw.com](mailto:david@victimrecoverylaw.com)

[keith@victimrecoverylaw.com](mailto:keith@victimrecoverylaw.com)



Attorneys for Plaintiffs

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
1719 Kossuth Street	:	AUGUST TERM, 2023
Camden, NJ 08104	:	NO.
and	:	
206 W. Buck Street	:	
Paulsboro, NJ 08606	:	
v.	:	
POLYMER80, INC.	:	
134 Lakes Blvd.	:	
Dayton, NV 89403	:	
and	:	
MARCUS BURNEY (PP No.: 816759)	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	

**PRAECIPE TO ISSUE WRIT OF SUMMONS**

**TO THE PROTHONOTARY:**

Kindly issue a Writ of Summons against the defendants in the above matter.

**VICTIMS RECOVERY LAW CENTER**

*David P. Thiruselvam*

Date: 08/29/2023

**DAVID P. THIRUSELVAM, ESQUIRE**

Attorney for Plaintiffs

## Commonwealth of Pennsylvania

COUNTY OF PHILADELPHIA

HECTOR GARCIA and ROSEANN MORRISON  
Individually and as Co-Administrators of the  
Estate of SAHMYA GARCIA, Deceased

Plaintiff

Filed and Attested by the  
Office of Judicial Records  
29 AUG 2023 09:07 am  
C. SMITH  
JUDICIAL DISTRICT OF PENNSYLVANIA

AUGUST Term, 20 23

vs.

POLYMER80, INC.

and

MARCUS BURNEY PP# 816759Defendant

No. \_\_\_\_\_

To<sup>1</sup>

POLYMER80, INC.

and

MARCUS BURNEY PP# 816759

## Writ of Summons

You are notified that the Plaintiff<sup>2</sup>*Usted esta avisado que el demandante*HECTOR GARCIA and ROSEANN MORRISONIndividually and as Co-Administrators of theEstate of SAHMYA GARCIA, Deceased

Has (have) commenced an action against you.

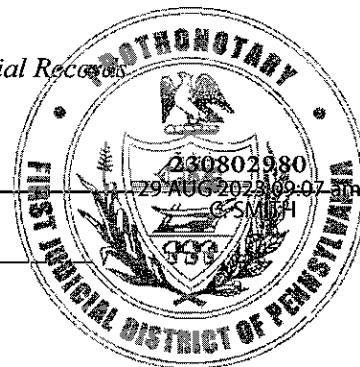
*Ha (han) iniciado una accion en contra suya.*

ERIC FEDER

Director, Office of Judicial Records

By: \_\_\_\_\_

Date: \_\_\_\_\_

<sup>1</sup> Name(s) of Defendant(s)<sup>2</sup> Name(s) of Plaintiff(s)

## Court of Common Pleas

AUGUST Term, 20 23

No. \_\_\_\_\_

HECTOR GARCIA and ROSEANN MORRISON  
Individually and as Co-Administrators of the  
Estate of SAHMYA GARCIA, Deceased

*Plaintiff*

vs.  
POLYMER80, INC.,  
and MARCUS BURNEY PP# 816759

*Defendant*

## SUMMONS

**VICTIMS' RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification No. 61815/317426

121 South Broad Street, 18th Floor

Philadelphia, Pennsylvania 19107

(215) 546-1433 - Telephone

(215) 644-8754 - Facsimile

david@victimrecoverylaw.com

keith@victimrecoverylaw.com

*Attorneys for Plaintiffs*

---

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO. 230802980
	:	
POLYMER80, INC., et al.	:	

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**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR  
DISCOVERY PURSUANT TO RULE 4009.21**

Plaintiff's, Hector Garcia and Roseann Morrison, both Individually and as Co-Administrator's of the Estate of Sahmya Garcia, Deceased, intend to serve a subpoena for records and things directed to Edward C. Meehan Jr., Esquire, identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file or record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

**VICTIMS' RECOVERY LAW CENTER**

*/s/ Keith Thomas West*

Date: September 5, 2023

**KEITH THOMAS WEST**  
*Attorney for Plaintiff*

**VICTIMS' RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification No. 61815/317426

121 South Broad Street, 18th Floor

Philadelphia, Pennsylvania 19107

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(215) 644-8754 - Facsimile

david@victimrecoverylaw.com

keith@victimrecoverylaw.com

*Attorneys for Plaintiffs*

---

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO. 230802980
	:	
POLYMER80, INC., et al.	:	

---

**TWENTY (20) DAY WAIVER AND REQUEST FOR RECORDS**

I, \_\_\_\_\_, Esquire, attorney for Defendant

\_\_\_\_\_ HAVE REVIEWED THE ATTACHED NOTICE OF INTENT  
REGARDING THIS INSTANT MATTER.

[MARK BLANK SPACES WITH X-MARKS AS APPROPRIATE BELOW]

I HEREBY DO \_\_\_\_ DO NOT \_\_\_\_ WAIVE THE 20-DAY NOTICE PERIOD.

I HEREBY DO \_\_\_\_ DO NOT \_\_\_\_ REQUIRE COPIES OF THE MATERIALS  
RECEIVED.

\_\_\_\_\_  
PRINTED NAME OF PARTY/PARTY'S COUNSEL IF REPRESENTED

\_\_\_\_\_  
SIGNATURE OF PARTY/PARTY'S COUNSEL IF REPRESENTED

Date: \_\_\_\_\_





COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA

Court of Common Pleas

GARCIA ETAL VS POLYMER80, INC. ETAL

August Term, 23

No. 02980

**Subpoena to Produce Documents or Things  
for Discovery Pursuant to Rule 4009.22**

TO: Edward C. Meehan Jr., Esquire

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Attached Addendum.

at: 121 S. Broad Street 18th Floor Philadelphia PA 19107

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

**This subpoena was issued at the request of the following person:**

Date: August 29, 2023

Name: Thiruselvam, David P

Address: The Victims' Recovery  
Law Center  
121 S Broad St, 18th Fl

Telephone: 215 546-1433

Supreme Court ID#: 61815

Attorney for: Plaintiffs



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.

Phone: (215) 686-6652 or Email: OJRCivil@courts.phila.gov

**BY THE COURT:**

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA

GARCIA ETAL VS POLYMER80, INC. ETAL : Court of Common Pleas  
:   
:   
: August Term, 23  
:   
: No. 02980

TO: Edward C. Meehan Jr., Esquire  
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,  
or the Certificate of Compliance,  
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce  
Documents or Things Pursuant to Rule 4009.23**

I, \_\_\_\_\_  
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on \_\_\_\_\_ have been produced.  
(Date of Subpoena)

Date: \_\_\_\_\_

\_\_\_\_\_  
(Signature of Person Served with Subpoena)

**VICTIMS' RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification Nos.: 61815/ 317426

121 South Broad Street, 18th Floor

Philadelphia, Pennsylvania 19107

215-546-1433 - Telephone

215-644-8754 - Fax

david@victimrecoverylaw.com

keith@victimrecoverylaw.com

Attorneys for the Plaintiff

---

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO. 230802980
	:	
POLYMER80, INC., et al.	:	

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**ADDENDUM TO SUBPOENA ISSUED TO EDWARD C. MEEHAN JR., ESQUIRE**

All non-privileged materials in your possession pertaining to Commonwealth v. Marcus Burney, MC-51-CR-0019749-2022, CP-51-CR-0000811-2023, including any Brady materials or evidence produced by you to the Commonwealth.

**VICTIMS' RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification No. 61815/317426

121 South Broad Street, 18th Floor

Philadelphia, Pennsylvania 19107

(215) 546-1433 - Telephone

(215) 644-8754 - Facsimile

david@victimrecoverylaw.com

keith@victimrecoverylaw.com

*Attorneys for Plaintiffs*

---

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO. 230802980
	:	
POLYMER80, INC., et al.	:	

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**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR  
DISCOVERY PURSUANT TO RULE 4009.21**

Plaintiff's, Hector Garcia and Roseann Morrison, Co-Administrator's of the Estate of Sahmya Garcia, Deceased, intend to serve a subpoena for records and things directed to the Philadelphia Police Department, identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file or record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

**VICTIMS' RECOVERY LAW CENTER**

*/s/ Keith Thomas West*

Date: September 5, 2023

**KEITH THOMAS WEST**  
*Attorney for Plaintiff*

**VICTIMS' RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification No. 61815/317426

121 South Broad Street, 18th Floor

Philadelphia, Pennsylvania 19107

(215) 546-1433 - Telephone

(215) 644-8754 - Facsimile

david@victimrecoverylaw.com

keith@victimrecoverylaw.com

*Attorneys for Plaintiffs*

---

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO. 230802980
	:	
POLYMER80, INC., et al.	:	

---

**TWENTY (20) DAY WAIVER AND REQUEST FOR RECORDS**

I, \_\_\_\_\_, Esquire, attorney for Defendant

\_\_\_\_\_ HAVE REVIEWED THE ATTACHED NOTICE OF INTENT  
REGARDING THIS INSTANT MATTER.

[MARK BLANK SPACES WITH X-MARKS AS APPROPRIATE BELOW]

I HEREBY DO \_\_\_\_\_ DO NOT \_\_\_\_\_ WAIVE THE 20-DAY NOTICE PERIOD.

I HEREBY DO \_\_\_\_\_ DO NOT \_\_\_\_\_ REQUIRE COPIES OF THE MATERIALS  
RECEIVED.

\_\_\_\_\_  
PRINTED NAME OF PARTY/PARTY'S COUNSEL IF REPRESENTED

\_\_\_\_\_  
SIGNATURE OF PARTY/PARTY'S COUNSEL IF REPRESENTED

Date: \_\_\_\_\_



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA

Court of Common Pleas

GARCIA ETAL VS POLYMER80, INC. ETAL

August Term, 23

No. 02980

**Subpoena to Produce Documents or Things  
for Discovery Pursuant to Rule 4009.22**

TO: Philadelphia Police Department

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Attached Addendum.

at: 121 S. Broad Street 18th Floor Philadelphia PA 19107

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

**This subpoena was issued at the request of the following person:**

Date: August 29, 2023

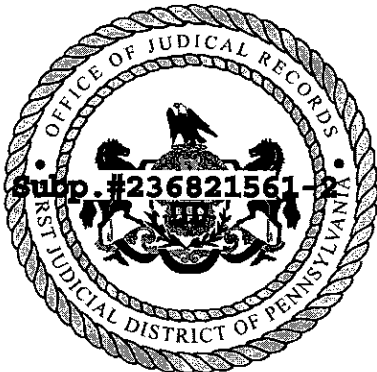
Name: Thiruselvam, David P

Address: The Victims' Recovery  
Law Center  
121 S Broad St, 18th Fl

Telephone: 215 546-1433

Supreme Court ID#: 61815

Attorney for: Plaintiffs



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.

Phone: (215) 686-6652 or Email: OJRCivil@courts.phila.gov

**BY THE COURT:**

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA

GARCIA ETAL VS POLYMER80, INC. ETAL : Court of Common Pleas  
:   
: August Term, 23  
:   
: No. 02980

TO: Philadelphia Police Department  
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,  
or the Certificate of Compliance,  
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce  
Documents or Things Pursuant to Rule 4009.23**

I, \_\_\_\_\_  
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on \_\_\_\_\_ have been produced.  
(Date of Subpoena)

Date: \_\_\_\_\_

\_\_\_\_\_  
(Signature of Person Served with Subpoena)

**VICTIMS' RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification Nos.: 61815/ 317426

121 South Broad Street, 18th Floor

Philadelphia, Pennsylvania 19107

215-546-1433 - Telephone

215-644-8754 - Fax

david@victimrecoverylaw.com

keith@victimrecoverylaw.com

Attorneys for the Plaintiff

---

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO. 230802980
	:	
POLYMER80, INC., et al.	:	

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**ADDENDUM TO SUBPOENA ISSUED TO CITY OF PHILADELPHIA  
POLICE DEPARTMENT**

Entire file concerning police investigation file regarding DC# 22-03-046443 including, but not limited to, incident report(s), addendums/supplements, witness statement(s), video surveillance, correspondence, memorandums, photographs, etc. regarding an assault that occurred on November 8, 2022, wherein victim Sahmya Garcia was fatally injured by gunshots.



**VICTIMS' RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification No. 61815/317426

121 South Broad Street, 18th Floor

Philadelphia, Pennsylvania 19107

(215) 546-1433 - Telephone

(215) 644-8754 - Facsimile

david@victimrecoverylaw.com

keith@victimrecoverylaw.com

*Attorneys for Plaintiffs*

---

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO.
	:	
POLYMER80, INC., et al.	:	

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**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR  
DISCOVERY PURSUANT TO RULE 4009.21**

Plaintiff's, Hector Garcia and Roseann Morrison, Co-Administrator's of the Estate of Sahmya Garcia, Deceased, intend to serve a subpoena for records and things directed to the Philadelphia Office of the District Attorney, identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file or record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

**VICTIMS' RECOVERY LAW CENTER**

*/s/ Keith Thomas West*

Date: September 5, 2023

**KEITH THOMAS WEST**  
*Attorney for Plaintiff*

**VICTIMS' RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification No. 61815/317426

121 South Broad Street, 18th Floor

Philadelphia, Pennsylvania 19107

(215) 546-1433 - Telephone

(215) 644-8754 - Facsimile

david@victimrecoverylaw.com

keith@victimrecoverylaw.com

*Attorneys for Plaintiffs*

---

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO.
	:	
POLYMER80, INC., et al.	:	

---

**TWENTY (20) DAY WAIVER AND REQUEST FOR RECORDS**

I, \_\_\_\_\_, Esquire, attorney for Defendant

\_\_\_\_\_ HAVE REVIEWED THE ATTACHED NOTICE OF INTENT  
REGARDING THIS INSTANT MATTER.

[MARK BLANK SPACES WITH X-MARKS AS APPROPRIATE BELOW]

I HEREBY DO \_\_\_\_ DO NOT \_\_\_\_ WAIVE THE 20-DAY NOTICE PERIOD.

I HEREBY DO \_\_\_\_ DO NOT \_\_\_\_ REQUIRE COPIES OF THE MATERIALS  
RECEIVED.

\_\_\_\_\_  
PRINTED NAME OF PARTY/PARTY'S COUNSEL IF REPRESENTED

\_\_\_\_\_  
SIGNATURE OF PARTY/PARTY'S COUNSEL IF REPRESENTED

Date: \_\_\_\_\_



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA

Court of Common Pleas

GARCIA ETAL VS POLYMER80, INC. ETAL

August Term, 23

No. 02980

**Subpoena to Produce Documents or Things  
for Discovery Pursuant to Rule 4009.22**

TO: Philadelphia Office of the District Attorney  
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Attached Addendum.

at: 121 S. Broad Street 18th Floor Philadelphia PA 19107  
(Address)

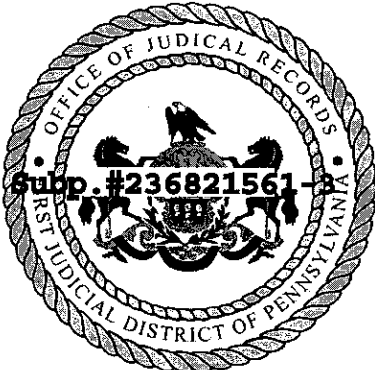
You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

**This subpoena was issued at the request of the following person:**

Date: August 29, 2023

Name: Thiruselvam, David P.  
Address: The Victims' Recovery  
Law Center  
121 S Broad St, 18th Fl  
Telephone: 215 546-1433  
Supreme Court ID#: 61815  
Attorney for: Plaintiffs



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.

Phone: (215) 686-6652 or Email: OJRCivil@courts.phila.gov

**BY THE COURT:**  
Eric Feder   
Deputy Court Administrator  
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF PHILADELPHIA

GARCIA ETAL VS POLYMER80, INC. ETAL : Court of Common Pleas  
:   
: August Term, 23  
:   
: No. 02980

TO: Philadelphia Office of the District Attorney  
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,  
or the Certificate of Compliance,  
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce  
Documents or Things Pursuant to Rule 4009.23**

I, \_\_\_\_\_  
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on \_\_\_\_\_ have been produced.  
(Date of Subpoena)

Date: \_\_\_\_\_

\_\_\_\_\_  
(Signature of Person Served with Subpoena)

**VICTIMS' RECOVERY LAW CENTER**

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification Nos.: 61815/ 317426

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Attorneys for the Plaintiff

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HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO. 230802980
	:	
POLYMER80, INC., et al.	:	

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**ADDENDUM TO SUBPOENA DIRECTED TO CITY OF PHILADELPHIA OFFICE OF  
DISTRICT ATTORNEY**

Entire file concerning the police investigation and prosecutorial proceedings regarding the Commonwealth of Pennsylvania . v. Marcus Burney, DC# 22-03-046443 including, but not limited to, incident report(s), addendums/supplements, witness statement(s), video surveillance, correspondence, memorandums, photographs, etc. regarding an assault that occurred on November 8, 2022, wherein victim Sahmya Garcia was fatally injured by gunshots.